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*Attorneys for Richard J. Samson,
as Trustee for the Chapter 7 Estate
of Edra D. Blixseth*

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA

In re

EDRA D. BLIXSETH,

Debtor.

Case No. 09-60452

RICHARD J. SAMSON, as Trustee for the
Chapter 7 Estate of Edra D. Blixseth,

Adversary No. 10-00094

Plaintiff,

v.

WESTERN CAPITAL PARTNERS LLC,

Defendant.

**NOTICE OF DESIGNATION OF PLAINTIFF'S EXPERT WITNESSES
AND OF SERVICE OF EXPERT WITNESS RESUMES**

Please take notice that Plaintiff Richard J. Samson, as Trustee for the Chapter 7 Bankruptcy Estate of Edra D. Blixseth, by and through his attorneys of record, designates the following individuals who they anticipate calling to testify as expert witnesses at the trial of this cause scheduled to commence July 25, 2011:

1. Names

Joe Karas, CPA
Business Assurance Partner
Moss Adams, LLP
805 SW Broadway, Suite 1200
Portland, OR 97205
Office: 503-242-1447
Facsimile: 503-274-2789

Nancy Young, CPA
Business Assurance Senior Manager
Moss Adams, LLP
805 SW Broadway, Suite 1200
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Office: 503-242-1447
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2. Subject Matter of Testimony

A. Mr. Karas and Ms. Young have been asked to determine the solvency or insolvency of Edra Blixseth on or about June 15, 2007, whether Ms. Blixseth was generally paying her debts as those debts came due on or about June 15, 2007, whether Ms. Blixseth was engaged in businesses and transactions for which the property remaining with her on or about June 15, 2007 was unreasonably small capital, and whether Ms. Blixseth had incurred debts beyond her ability to repay as those debts matured on or about June 15, 2007.

B. Mr. Karas and Ms. Young have been asked to determine the solvency or insolvency of Edra Blixseth on or about June 25, 2008, whether Ms. Blixseth was generally paying her debts as those debts came due on or about June 25, 2008, whether Ms. Blixseth was

engaged in businesses and transactions for which the property remaining with her on or about June 25, 2008 was unreasonably small capital, and whether Ms. Blixseth had incurred debts beyond her ability to repay as those debts matured on or about June 25, 2008.

3. Written Report

Mr. Karas and Ms. Young are in the process of analyzing information relating to the subject matter of their testimony. It is anticipated that such report will be finalized and disclosed no later than May 2, 2011.

Please take notice that the resumes of the above identified expert witnesses will be served today, by email, on the attorneys for Defendant as follows:

Robert W. Hatch II
Joseph J. Novak
Hatch Halstead, LLC
730 Seventeenth St., Suite 200
Denver, CO 80202
rhatch@hatchlawyers.com
jnovak@hatchlawyers.com

DATED this 1st day of April, 2011.

By: /s/ David B. Cotner
David B. Cotner
Bradley R. Duncan
Hugh R. McCullough
*Attorneys for Richard J. Samson,
Chapter 7 Trustee for Edra D. Blixseth*

CERTIFICATE OF MAILING

The undersigned hereby certifies under penalty of perjury that on the 1st day of April, 2011, a copy of the foregoing pleading was served (i) by electronic means, pursuant to LBR 7005-1, 9013-1(c) and 9036-1 on the parties noted in the Court's ECF transmission facilities and/or (ii) by first class mail and email to the following parties:

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By: /s/ David B. Cotner